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Attorneys for Plaintiff
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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

TIARE RAMIREZ, an individual;

Plaintiff,

vs.

WYNN LAS VEGAS, LLC; DOES I
 through X; and ROE Corporations XI
 through XX inclusive,

Defendant.

Case No. 2:19-cv-01174-APG-BNW

**STIPULATION AND ORDER TO
 EXTEND JOINT PRETRIAL ORDER
 DEADLINE**

(Fifth Request)

**STIPULATION AND ORDER TO EXTEND
 JOINT PRETRIAL ORDER DEADLINE**

The parties by and through their respective attorneys of record, hereby stipulate to a thirty (30) day extension up to and including April 11, 2023, to file the Joint Pretrial Order. Per LR IA 6-1, Defendant filed the first Stipulation and Order to extend the Joint Pretrial Order Deadline on September 7, 2022 (ECF No. 78), Plaintiff filed the second Stipulation and Order to extend the Joint Pretrial Order Deadline on October 27, 2022 (ECF No. 80), Plaintiff filed the third Stipulation and Order to extend the Joint Pretrial Order Deadline on November 21, 2022 (ECF No. 82), and Plaintiff filed the fourth Stipulation and Order to Extend the Joint Pretrial Order Deadline on December 22, 2022 (ECF No. 84). To date, the parties are working and conferring together to complete the Joint Pretrial Order to completion and finalization. This is the fourth request for extension to file Joint

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1 Pretrial Order. The deadline for the Joint Pretrial Order is currently March 12,
2 2023. See ECF No. 85. Plaintiff has requested this extension and Defendant has
3 agreed to the request.

4 Good cause exists for such extension. Defendant has tendered a draft of
5 JPTO to Plaintiff. Plaintiff and Defendant are meeting and conferring to complete
6 such JPTO requirements in order to submit a finalized JPTO. Plaintiff's counsel
7 has prior scheduled travel commitments, needs to tend to personal family matters
8 including matters relating to his father's medical prognosis, his ongoing legal
9 matters, and requires the extension to conduct due diligence and potentially
10 streamline various issues. Additionally, Plaintiff's counsel's prior travel
11 commitments have had to be rescheduled and extended due to weather events
12 across the country which has further impacted Plaintiff's counsel's calendar and
13 commitments. Simultaneously, a key employee required leave to deal with a
14 debilitating medical condition. Finally, the parties are working together in good
15 faith to explore parameters and issues related to possible resolution of this matter.

16 Accordingly, the parties stipulate to extending the deadline to file the Joint
17 Pretrial Order deadline to April 11, 2023.

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This request is not sought for any improper purpose or other reason of delay. No party is prejudiced by the requested extension.

IT IS SO STIPULATED.

Dated: March 8, 2023

Dated: March 8, 2023

Respectfully submitted,

Respectfully submitted,

/s/ Christian Gabroy

/s/ Kelsey Stegall

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*Attorneys for Plaintiff
Tiara Ramirez*

*Attorneys for Defendant
Wynn Las Vegas, LLC*

ORDER

IT IS SO ORDERED

DATED: 3:47 pm, March 13, 2023



**BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE**